

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SVETLANA SHOLOPA and MILICA MILOSEVIC, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

TURK HAVA YOLLARI A.O., INC. (d/b/a Turkish Airlines, a foreign corporation), and TURKISH AIRLINES, INC., a New York Corporation

Defendants.

Case No. 1:20-cv-03294-ALC

Hon. Andrew L. Carter

**NOTICE OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that upon: (1) the accompanying Memorandum of Law; (2) the Declaration of Yeremey O. Krivoshey, and the exhibits attached thereto (including the Parties' Class Action Settlement Agreement); Plaintiffs Svetlana Sholopa and Milica Milosevic, by andthrough their undersigned attorneys, will move this Court, before the Honorable Andrew L. Carter, United States District Court Judge, Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an Order, pursuant to Federal Rule of Civil Procedure 23(e): (i) granting preliminary approval of the Class Action Settlement; (ii) provisionally certifying the Settlement Class under Federal Rule of Civil Procedure 23(b)(3) in connection with the settlement process; (iii) appointing Burson & Fisher, P.A. and Liddle Sheets Coulson P.C. as Class Counsel; (iv) appointing Svetlana Sholopa and Milica Milosevic as the Class Representatives for the Settlement Class; and (v) granting such other, further, or different relief as the court deems just and proper. A Proposed Preliminary Approval Order is submitted herewith as Exhibit E to the Settlement.

Dated: December 20, 2022

Respectfully submitted,

By: /s/ Max S. Roberts  
Max S. Roberts

**BURSOR & FISHER, P.A.**

Max S. Roberts  
888 Seventh Avenue  
New York, NY 10019  
Telephone: (646) 837-7150  
Facsimile: (212) 989-9163  
Email: mroberts@bursor.com

**BURSOR & FISHER, P.A.**

Yeremey O. Krivoshey (*Pro Hac Vice*)  
1990 North California Blvd., Suite 940  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
Email: ykrivoshey@bursor.com

**LIDDLE SHEETS COULSON P.C.**

Nicholas A. Coulson (*Pro Hac Vice*)  
975 E. Jefferson Avenue  
Detroit, Michigan 48207  
Telephone: (313) 392-0015  
Facsimile: (313) 392-0025  
Email: ncoulson@lsccounsel.com

*Proposed Class Counsel*